

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

LULAC, et. al.,

Plaintiffs

Alexander Green, and Jasmine
Crockett

Plaintiff-Intervenors

V.

GREG ABBOTT, in his official capacity
As Governor of Texas, et. al.

Defendants

Case No.: 3-21-CV-00259-DCG-
JES-JVB [Lead Case]

UNOPPOSED MOTION TO WITHDRAW AS COUNSEL

TO THE HONORABLE COURT:

COMES NOW Nickolas A. Spencer, J.D., MA, Attorney and Counselor at Law, and respectfully moves this Court for an order permitting withdrawal as counsel for the Congressional Intervenors in the above-styled cause, and in support thereof would show the Court as follows:

Federal Rule of Civil Procedure 11(b) and Local Rules of the Western District of Texas govern attorney withdrawal from federal litigation. An attorney may withdraw from representation with court approval when withdrawal can be accomplished without material adverse effect on the interests of the client. The Court must consider whether withdrawal would unduly delay the proceedings or prejudice the parties.

Additionally, Texas Disciplinary Rules of Professional Conduct Rule 1.15 governs the termination of representation, requiring that withdrawal not materially adversely affect the client's interests unless the client consents or withdrawal is permitted or required by law.

Undersigned counsel seeks to withdraw as attorney of record for Congressional Intervenor Eddie Bernice Johnson, Sheila Jackson Lee, Alexander Green, and Jasmine Crockett in the above-styled redistricting litigation¹.

Procedural Posture: This case involves challenges to Texas Congressional District Plan C2193 under the Fourteenth Amendment and Fifteenth Amendment. The case has progressed through

significant discovery, including depositions of key witnesses such as Representative Jasmine Crockett¹ and expert witnesses.

The withdrawal is sought in good faith and not for purposes of delay or tactical advantage.

Client Protection: The Congressional Intervenors will continue to be represented by co-counsel Gary L. Bledsoe of The Bledsoe Law Firm, PLLC, who has been actively participating in this litigation as evidenced by his representation of Representative Crockett during her deposition¹. Mr. Bledsoe is fully familiar with the case and capable of continuing representation without interruption.

No Prejudice: Withdrawal at this time will not prejudice the Congressional Intervenors or other parties. Co-counsel remains available to continue zealous representation, and no critical deadlines are immediately pending that would be adversely affected by undersigned's withdrawal.

Conclusion

Based on the foregoing, withdrawal can be accomplished without material adverse effect on the Congressional Intervenors' interests, as competent co-counsel remains to continue representation. The motion serves judicial economy by clarifying counsel of record without disrupting the litigation.

WHEREFORE, PREMISES CONSIDERED, Movant respectfully requests that this Court grant this Motion to Withdraw and remove Nickolas A. Spencer as attorney of record for the Congressional Intervenors in this cause.

Respectfully submitted,

NICKOLAS A. SPENCER
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Certificate of Service

I hereby certify that a true and correct copy of the foregoing Motion to Withdraw has been served via ecf to all associated parties.

Respectfully Submitted,

By: /s/ Gary Bledsoe

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